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30 UNITED STATES DISTRICT COURT  
31 NORTHERN DISTRICT OF CALIFORNIA

32 IN RE: SOCIAL MEDIA ADOLESCENT  
33 ADDICTION/PERSONAL INJURY  
34 PRODUCTS LIABILITY LITIGATION

35 This Document Relates to:

36 *Brittany Doffing*, 4:22-cv-05892;

37 *Malinda Harris*, 4:22-cv-06085;

38 Case No. 4:22-MD-03047-YGR  
MDL No. 3047

39 ***RECTIFIED SUPPLEMENTAL  
DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF  
PLAINTIFFS' CONSOLIDATED EX  
PARTE APPLICATION FOR  
APPOINTMENT OF GUARDIANS AD  
LITEM***

1      *Ayla Tanton*, 4:22-cv-06545;  
2      *Megan Waddell*, 4:22-cv-05888;  
3      *Virginia Roth*, 4:22-cv-05884;  
4      *Cecelia Tesch*, 4:22-cv-06167;  
5      *Apriel Dorsey*, 4:22-cv-06451;  
6      *Damian Johnson (and as next of friend to*  
7      *minors K.L.J., J.A.J., and K.A.J.)*, 4:22-cv-  
8      06418;  
9      *E.W.*, 4:22-cv-04528;  
10     *M.C.*, 4:22-cv-04529;  
11     *T.K.*, 4:22-cv-04588;  
12     *T.R.*, 4:22-cv-04712;  
13     *C.C.*, 4:22-cv-04709;  
14     *J.H. (and as next of friend to minors N.R.*  
15     *and A.M.)*, 4:22-cv-04710;  
16     *Shaw Jamerson*, 4:22-cv-06384;  
17     *L.A.T. (and as next of friend to minors P.T.*  
18     *and L.T.)*, 4:22-cv-04937;  
19     *S.R.*, 4:22-cv-06455;  
20     *Andrea Harrison*, 4:22-cv-06452;  
21     *Bethany Odems*, 4:22-cv-06440;  
22     *Sabrina Huff-Young*, 4:22-cv-06430;  
23     *Luvonia Brown*, 4:22-cv-06668;  
24     *Tabitha Quinones*, 4:22-cv-06431;  
25     *Shanetta Kimber (and as next friend to minor*  
26     *D.K.)*, 4:22-cv-06434;  
27     *Mandy S. Westwood*, 4:22-cv-06461;  
28

1       *Robert Turgeon*, 4:22-cv-06616;  
2       *Angela Canche*, 4:22-cv-06449;  
3       *Bernard Cerone*, 4:22-cv-06417;  
4       *Jennifer Koutsouftikis*, 4:22-cv-06643;  
5       *T.S.*, 4:22-cv-06454;  
6       *Chad Smith*, 4:22-cv-06421;  
7       *Stoudemire (on behalf of De'John*  
8       *Davidson)*, 4:22-cv-06495;  
9       *Stoudemire (on behalf of Ja'Taesha*  
10      *Davidson)*, 4:22-cv-05987;  
11      *Tiffany Woods*, 4:22-cv-6591;  
12      *V.P.*, 4:22-cv-06617;  
13      *J.O.*, 4:22-cv-05546;  
14      *Rossana Agosta*, 4:22-cv-05565;  
15      *M.F.*, *B.F.*, *A.F.*, 4:22-cv-05573;  
16      *Nicholas Calvoni*, 4:22-cv-05873;  
17      *Dayna Page*, 4:22-cv-06124;  
18      *Sarie Neave*, 4:22-cv-06126;  
19      *Julie Kosiorek*, 4:22-cv-06142;  
20      *Zakey Amacker*, 4:22-cv-06150;  
21      *Tracy Hunt*, 4:22-cv-06155;  
22      *Tamesha Hicks*, 4:22-cv-06162;  
23      *D.D.*, *G.D.*, 4:22-cv-06190;  
24      *Amanda Duke*, 4:22-cv-06200;  
25      *Danielle Cohen*, 4:22-cv-06207;  
26      *Kenisha Day*, 4:22-cv-06215;  
27      *I.A.*, 4:22-cv-06252;

1 *Margit LaBlue*, 4:22-cv-06256;  
2 *Khymberly Levin*, 4:22-cv-06263;  
3 *Christian Brooks*, 4:22-cv-06308;  
4 *Michelle Wheeldon*, 4:22-cv-06306;  
5 *Jessica Bright*, 4:22-cv-06318;  
6 *Rachelle Capka*, 4:22-cv-06583;  
7 *Lawanda Simpson*, 4:22-cv-06587;  
8 *Jeffrey Wombles*, 4:22-cv-06685;  
9 *Melanie Clarke-Penella*, 4:22-cv-06692;  
10 *Lorine Hawthorne*, 4:22-cv-06751;  
11 *Chris J. Czubakowski*, 4:22-cv-06989;  
12 *C.U.*, 4:22-cv-07347;  
13 *N.W.*, 4:22-cv-08937;  
14 *David Hemmer*, 4:23-cv-00055;  
15 *C.N.*, 4:22-cv-04283;  
16 *Star Wishkin*, 4:22-cv-06459;  
17 *Donna Copelton*, 4:22-cv-06165;  
18 *Diane Williams*, 4:22-cv-05886;  
19 *J.A., K.L., and A.L.*, 4:23-cv-00515;  
20 *G.W.*, 4:23-cv-00545  
21 *Elizabeth Mullen*, 4:23-cv-00600;  
22 *A.C.*, 4:23-cv-00646;  
23 *D.D., J.D.*, 4:22-cv-06205;  
24 *Jessica Guerrero*, 4:22-cv-05894;  
25 *Stephanie Carter*, 4:22-cv-05986;  
26 *Kelli Cahoon*, 4:22-cv-06117;  
27 *Kim Isaacs*, 4:22-cv-05885;  
28

1        *Edyta Lee*, 4:22-cv-06426;  
 2        *Shanetta Kimber (I)*, 4:22-cv-06498;  
 3        *Debra Hudson*, 4:22-cv-06296;  
 4        *Veronica Hicks*, 4:22-cv-06627;  
 5        *Donavette Ely*, 4:22-cv-06067

7        I, Jennie Lee Anderson, do hereby declare and state as follows:

8        1.        I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted  
 9        to practice before the courts of the State of California and in the Northern District of California. I  
 10       am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent*  
 11       *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of  
 12       record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
 13       make this declaration of my own personal knowledge and, if called as a witness, I could and  
 14       would testify competently to the matters stated below.

15       2.        I make this declaration in support of Plaintiffs' Consolidated *Ex Parte*  
 16       Application for Appointment of Guardian *Ad Litem* (ECF 149).

17       3.        Pursuant to the Court's Order Re: Appointment of Guardians *Ad Litem* (ECF  
 18       No. 188), my office reviewed each of the *Ex Parte* Applications attached as Exhibits 1 to 75 to  
 19       the Declaration of Jennie Lee Anderson In Support of Plaintiffs' Consolidated *Ex Parte*  
 20       Application for Appointment of Guardians *Ad Litem* ("Anderson Declaration") (ECF No. 149-1)  
 21       for accuracy and completeness, and to identify Applications where the minor has reached the age  
 22       of majority or where the case has been dismissed.

23       4.        On March 26, 2023, it was brought to my attention that information previously  
 24       entered into certain applications was missing from the final submissions attached as Exhibits to  
 25       the Anderson Declaration and in the Supplemental Declaration of Jennie Lee Anderson in  
 26       Support of Plaintiffs' Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*  
 27       ("Supplemental Anderson Declaration") (ECF Nos. 149-1 and 209). Further inquiry revealed that

1 these PDF files had become corrupted when they were condensed in size prior to filing to meet  
 2 the District's ECF guidelines regarding size limitations for exhibits. These corruptions obscured  
 3 many of the relationship designations in the applications and, in one instance, purged the e-  
 4 signature of an attorney.

5       5. Accordingly, Plaintiffs submit this **Corrected** Declaration correcting these  
 6 technical errors. Attached hereto are the following **Revised Exhibits** (using the same original  
 7 Exhibit numbers identified in the previously filed Anderson Declaration and Supplemental  
 8 Anderson Declaration (ECF Nos. 149; 149-1)).

- 9           a. Attached hereto at **Revised Exhibit 3** is a true and correct copy of the *Ex Parte*  
 10           Application for Appointment of Guardian *Ad Litem* I received for the case  
 11           *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545.
- 12           b. Attached hereto at **Revised Exhibit 4** is a true and correct copy of the *Ex Parte*  
 13           Application for Appointment of Guardian *Ad Litem* I received for the case  
 14           *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888.
- 15           c. Attached hereto at **Revised Exhibit 8** is a true and correct copy of the first *Ex*  
 16           *Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and*  
 17           *as next of friend to minor K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-  
 18           06418.
- 19           d. Attached hereto as **Revised Exhibit 9** is a true and correct copy of the second  
 20           *Ex Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and*  
 21           *of next of friend to minor J.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-  
 22           06418.
- 23           e. Attached hereto at **Revised Exhibit 10** is a true and correct copy of the third *Ex*  
 24           *Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and*  
 25           *to next of friend to minor K.A.J.) v. Meta Platforms. Inc., et al.*, 4:22-cv-06418.
- 26           f. Attached hereto at **Revised Exhibit 11** is a true and correct copy of the *Ex*  
 27           *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 28           case *E.W. v. Youtube LLC*, et al., 4:22-cv-04528.

1 g. Attached hereto as **Revised Exhibit 12** is a true and correct copy of the *Ex*  
2 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
3 case *M.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04529.

4 h. Attached hereto at **Revised Exhibit 13** is a true and correct copy of the *Ex*  
5 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
6 case *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588.

7 i. Attached hereto at **Revised Exhibit 15** is a true and correct copy of the *Ex*  
8 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
9 case *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709.

10 j. Attached hereto at **Revised Exhibit 16** is a true copy and correct copy of the  
11 first *Ex Parte* Application for Appointment of Guardian *Ad Litem* for the case  
12 *J.H. (and as next of friend to minor N.R.) v. Meta Platforms, Inc., et al.*, 4:22-  
13 cv-04710.

14 k. Attached hereto at **Revised Exhibit 17** is a true and correct copy of the second  
15 *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
16 case *J.H. (and as next of friend to minor A.M.) v. Meta Platforms, Inc., et al.*,  
17 4:22-cv-04710.

18 l. Attached hereto as **Revised Exhibit 18** is a true and correct copy of the *Ex*  
19 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
20 case *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384.

21 m. Attached hereto at **Revised Exhibit 19** is a true and correct copy of the first *Ex*  
22 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
23 case *L.A.T. (as next of friend to P.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-  
24 04937.

25 n. Attached hereto at **Revised Exhibit 20** is a true and correct copy of the *Ex*  
26 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
27 case *S.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-06455.

28 o. Attached hereto at **Revised Exhibit 36** is a true and correct copy of the *Ex*

*Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Woods v. Meta Platforms, Inc., et al et al.*, 4:22-cv-06591.

- p. Attached hereto at **Revised Exhibit 37** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *V.P. v. Meta Platforms, Inc., et al.*, 4:22-cv-06617.
- q. Attached hereto at **Revised Exhibit 38** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546.
- r. Attached hereto at **Revised Exhibit 39** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565.
- s. Attached hereto at **Revised Exhibit 40** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573.
- t. Attached hereto at **Revised Exhibit 41** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873.
- u. Attached hereto at **Revised Exhibit 45** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150.
- v. Attached hereto at **Revised Exhibit 47** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162.
- w. Attached hereto at **Revised Exhibit 48** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *D.D., G.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06190.
- x. Attached hereto at **Revised Exhibit 52** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the

1 case *I.A. v. Meta Platforms, Inc., et al.*, 4:22-cv-06252.

2 y. Attached hereto at **Revised Exhibit 54** is a true and correct copy of the *Ex*  
 3 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 4 case *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263.

5 z. Attached hereto at **Revised Exhibit 56** is a true and correct copy of the *Ex*  
 6 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 7 case *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306.

8 aa. Attached hereto at **Revised Exhibit 60** is a true and correct copy of the *Ex*  
 9 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 10 case *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685.

11 bb. Attached hereto at **Revised Exhibit 61** is a true and correct copy of the *Ex*  
 12 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 13 case *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692.

14 cc. Attached hereto at **Revised Exhibit 64** is a true and correct copy of the *Ex*  
 15 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 16 case, *C.U. v. Snap Inc, et al.*, 4:22-cv-07347.

17 dd. Attached hereto at **Revised Exhibit 67** is a true and correct copy of the *Ex*  
 18 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the  
 19 case, *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886.

20 ee. Attached hereto at **Revised Exhibit 68** is a true and correct copy of the *Ex*  
 21 *Parte* Application for Appointment of Guardian *Ad Litem* I received for  
 22 *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165.

23 ff. Attached hereto at **Revised Exhibit 69** is a true and correct copy of the *Ex*  
 24 *Parte* Application for Appointment of Guardian *Ad Litem* I received for *J.A.,*  
 25 *K.L., and A.L. v. TikToc, et al.*, 4:23-cv-00515.

26 gg. Attached hereto at **Revised Exhibit 70** is a true and correct copy of the *Ex*  
 27 *Parte* Application for Appointment of Guardian *Ad Litem* I received for *G.W.*  
 28 *v. Snap, Inc.*, 4:23-cv-00545.

hh. Attached hereto at **Revised Exhibit 71** is a true and correct copy of the second *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for *L.A.T. (and as next of friend to minor P.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937.

ii. Attached hereto at **Revised Exhibit 73** is a true and correct copy I received of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* for A.C. v. *Meta Platforms, Inc., et al.*, 4:23-cv-00646.

jj. Attached hereto at **Revised Exhibit 74** is a true and correct copy I received of  
*the Ex Parte Application for Appointment of Guardian Ad Litem for Wishkin v.  
Meta Platforms, Inc., et al., 4:22-cv-03047.*

kk. Attached hereto at **Revised Exhibit 75** is a true and correct copy of the Ex Parte Application for Appointment of Guardian Ad Litem for *D.D., J.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06205.

6. Each application has been made by the minor's parent and/or legal guardian.

Further, each of the *Ex Parte* Applications are consistent with Attachment A to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (ECF No. 122), and include (1) the applicant’s name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Each Application also includes the minor’s full name.

7. I have been informed by counsel for Plaintiffs in the following cases that the named Plaintiffs were minors at the time their cases were filed, but they have subsequently reached the minimum age of capacity to sue in the state of their domicile (or will be reaching the age of majority by March 30, 2023) such that they no longer require that their action be brought by a next friend or guardian *ad litem*.

- *Doffing v. Meta Platforms, Inc., et al.*, 4:22-cv-05892;

- 1     • *Guerrero v. Meta Platforms, Inc., et al.*, 4:22-cv-05894;
- 2     • *Carter v. Meta Platforms, Inc., et al.*, 4:22-cv-05986;
- 3     • *Cahoone v. Meta Platforms, Inc., et al.*, 4:22-cv-06117;
- 4     • *Isaacs v. Meta Platforms, Inc., et al.*, 4:22-cv-05885;
- 5     • *Lee v. Meta Platforms, Inc., et al.*, 4:22-cv-06426;
- 6     • *Kimber v. Meta Platforms, Inc., et al.*, 4:22-cv-06498;
- 7     • *Hudson v. Meta Platforms, Inc., et al.*, 4:22-cv-06296;
- 8     • *Hicks (Veronica) v. Meta Platforms, Inc., et al.*, 4:22-cv-06627;
- 9     • *C.N. v. Meta Platforms, Inc.*, 4:22-cv-04283;
- 10    • *Ely v. Meta Platforms, Inc., et al.*, 4:22-cv-06067;
- 11    • *Mullen v. Meta Platforms, Inc., et al.*, 4:23-cv-00600; and
- 12    • *T.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-04712

13       8. Furthermore, since the filing of Plaintiffs' Consolidated *Ex Parte* Application, the  
 14 following cases have been dismissed:

- 15     • *Harris v. Meta Platforms, Inc., et al.*, 4:22-cv-06085 (Exhibit 2);
- 16     • *Roth v. Meta Platforms, Inc., et al.*, 4:22-cv-05884 (Exhibit 5);
- 17     • *Odems v. Meta Platforms, Inc., et al.*, 4:22-cv-06440 (Exhibit 22);
- 18     • *Huff-Young v. Meta Platforms, Inc., et al.*, 4:22-cv-06430 (Exhibit 23);
- 19     • *Brown v. Meta Platforms, Inc., et al.*, 4:22-cv-06668 (Exhibit 24);
- 20     • *Quinones v. Meta Platforms, Inc., et al.*, 4:22-cv-06431 (Exhibit 25);
- 21     • *Kimber v. Meta Platforms, Inc., et al.*, 4:22-cv-06434 (Exhibit 26);
- 22     • *Smith (Chad) v. Meta Platforms, Inc., et al.*, 4:22-cv-06421 (Exhibit 33);
- 23     • *Hunt v. Meta Platforms, Inc., et al.*, 4:22-cv-6155 (Exhibit 46);
- 24     • *Day v. Meta Platforms, Inc., et al.*, 4:22-cv-06215 (Exhibit 51);
- 25     • *Brooks v. Meta Platforms, Inc., et al.*, 4:22-cv-06308 (Exhibit 55);
- 26     • *Bright v. Meta Platforms, Inc., et al.*, 4:22-cv-06318 (Exhibit 57);
- 27     • *Capka v. Meta Platforms, Inc., et al.*, 4:22-cv-06583 (Exhibit 58); and
- 28     • *Simpson v. Meta Platforms, Inc., et al.*, 4:22-cv-06587 (Exhibit 59).

1           9. To the best of my knowledge, all minor Plaintiffs whose cases were transferred  
2 or assigned to this Multidistrict Litigation on or before December 27, 2022, have submitted an  
3 Application for Appointment of Guardian *Ad Litem*, true and correct copies of which are attached  
4 hereto.

5           I declare under penalty of perjury pursuant to the laws of the United States of America that  
6 the foregoing is true and correct.

7

8           Dated: March 28, 2023

Respectfully submitted,

9           /s/Jennie Lee Anderson  
10           Jennie Lee Anderson

11           *Plaintiffs' Liaison Counsel*

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